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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	CHAPTER 13
BRAD J. GERSTEIN	:	
ROSEMARIE GERSTEIN	:	CASE NO. 1:16-BK-02368
Debtors	:	

**MOTION TO AMEND ORDER PERMITTING**  
**SALE OF REAL PROPERTY**

Brad J. Gerstein and Rosemarie Gerstein, Debtors, by and through counsel, hereby move this Honorable Court to amend the Order entered May 29, 2018 approving the sale of real property and represent as follows:

1. The Court approved the sale of the real estate known as 50 Atherton Street, Wyoming, Pennsylvania for a consideration of \$160,000.00 pursuant to the terms of an Agreement of Sale that was attached to the Motion as an exhibit.
2. The Agreement of Sale called for a Seller's assist of \$5,000.00 and, therefore, a net sales price of \$155,000.00.
3. The parties have renegotiated and have agreed to a sale price of \$152,500.00 without a Seller's assist and a credit of \$1,236.00 to compensate the Buyers for a delay in the closing for a net sales price of \$151,264.00.


4. In either event, the Debtors' Chapter 13 Plan will be paid in full and it will have no impact on the creditors.

WHEREFORE, the Debtors move this Honorable Court to amend the Order entered May 29, 2018 as follows:

1. The sale of the Debtors' real estate known as 50 Atherton Street, Wyoming, PA to Frederick J. Solano for a consideration of \$151,264.00 is approved;
2. The payment of a real estate broker's commission to be shared equally between Lewith & Freeman Realtors and Century 21 Smith Hourigan Group in the amount of \$9,600.00 is approved;
3. The outstanding balance of the M&T mortgages and all other liens on the property together with all customary and usual closing costs as well as a realtor's commission shall be paid from the proceeds of the sale at closing;
4. The net proceeds of this sale in excess of any available statutory exemption shall be paid to the Chapter 13 Trustee for application to the Plan.

Respectfully submitted,

PUGLIESE, FINNEGAN, SHAFFER & FERENTINO LLC

BY:   
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Date: June 15, 2018